

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER CRESPO, *et al.*,

Plaintiff,

s-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT
PURSUANT TO RULE 56 OF
THE FEDERAL RULES OF
CIVIL PROCEDURE**

22-CV-2693 (BMC)
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PLEASE TAKE NOTICE that, upon the annexed Declaration of James R. Murray, dated February 3, 2023, the Exhibits annexed thereto, the accompanying Memorandum of Law in Support of Defendants' Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, dated February 3, 2023, and all prior papers and proceedings had herein, the City of New York, Joseph Ieraci, Laurene Bove, Zachary Cullen, and Angelo Pirozzi will move this Court, before the Honorable Brian M. Cogan, at the United States District Court of the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, on a date and time to be determined by the Court, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, dismissing Plaintiffs' Amended Complaint in its entirety, with prejudice, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated January 17, 2023, the parties' respective oppositions are due on or before February 28, 2023.

Dated: New York, New York
February 3, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel for the City of New York
Attorney for Defendants City of New York, Joseph
Ieraci, Laurene Bove, Zachary Cullen, and Angelo
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By: James R. Murray /s/
James R. Murray
Assistant Corporation Counsel

22-CV-2693 (BMC)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JENNIFER CRESPO, *et al.*,

Plaintiffs,

-against-

THE CITY OF NEW YORK, *et al.*,

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**DEFENDANTS' NOTICE OF MOTION FOR
SUMMARY JUDGMENT PURSUANT TO
RULE 56 OF THE FEDERAL RULES OF
CIVIL PROCEDURE**

HON. SYLVIA O. HINDS-RADIX

*Corporation Counsel of the City of New York
Attorney for Defendants City of New York, Joseph
Ieraci, Laurene Bove, Zachary Cullen, and Angelo
Pirozzi*

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Of Counsel: James R. Murray
Tel: (212) 356-2372*

Due and timely service is hereby admitted.

New York, N.Y., 2023

.....Esq.

Attorney for.....